



July 19, 2023

**VIA ECF**

The Honorable Nicholas G. Garaufis  
United States District Judge  
U.S. District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Boustani, Case No. 18-cr-681

Dear Judge Garaufis:

We write on behalf of Manuel Chang regarding his treatment while detained at the Brooklyn Metropolitan Detention Center (“MDC”). We visited with Mr. Chang in-person yesterday and were informed by him that he has not been given any of his prescription medications since arriving there last week. Specifically, Mr. Chang requires medications for his diabetes, high-blood pressure, and cholesterol. We understand that these medications were provided to him during his entire four-and-a-half year incarceration in South Africa, and should have been transported with him during his extradition. We respectfully seek court intervention to ensure that Mr. Chang receive his daily prescription medications, specifically an order directing the MDC to administer his prescribed medications daily.

I have conferred with Mr. Hiral in this matter and he advises that the government takes no position on this letter, better offered to assist in any way appropriate to ensure Mr. Chang receives his medications. We are filing this letter under seal given the description of Mr. Chang’s medical conditions herein.

We thank Your Honor for consideration of this matter.

Respectfully submitted,

*Adam Ford*

cc: All Counsel of Record (via ECF)